

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

United States of America

v.

Michael Clemence

1:21-cr-00099-LM

ASSENTED-TO MOTION TO CONTINUE TRIAL

The accused, through counsel, John P. Newman, Esq., respectfully requests that this Court grant this motion to continue.

In support, it is stated:

1. The United States has charged the Defendant with Possession of Child Pornography, contrary to 18 U.S.C. §§ 2252A(a)(5)(B) & (b)(2).
2. A final Pretrial Hearing is scheduled for October 7, 2021 with Jury Selection for October 19, 2021.
3. The parties are both reviewing discovery and negotiating a non-trial resolution to this case. They anticipate that these tasks can be completed with the benefit of a 60-day continuance. The process is taking longer than expected due to the number of devices involved.
4. Pursuant to Administrative Order 20-24, defense counsel hereby certifies that:
 - a. He has consulted with the defendant about the requested continuance,
 - b. He has explained to the defendant that, by seeking a continuance, the defendant is waiving his constitutional and statutory rights to a speedy trial,
 - c. The defendant has personally assented to the continuance, and
 - d. Defense counsel is forthwith mailing or electronically transmitting to the defendant a copy of the motion to continue.
5. The United States, through prosecuting attorney, Kasey Weiland, Esq., assents to this motion.

WHEREFORE, the accused respectfully requests that this Court grant this motion and continue the trial in this case for a period of 60 days.

Respectfully submitted,

/s/ John P. Newman
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion has been forwarded by electronic mail through the ECF system on September 13, 2021, to Kasey Weiland, Esq.

/s/ John P. Newman
John P. Newman